

DATE	NOTE / RECORD	TIME
	Client Intake review docs and fact history assess claims and consult client	2.5
1/22/2007	Phones client re emotional damages/issues prep file	0.5
1/25/2007	Draft complaint & docs	2.5
	R & R addl documents from client	0.2
	Phone call to client re updates	0.4
	Forward draft complaint to client for review and confirmation	0.1
1/29/2007	Forward Complaint and Summons for service and filing/ Review DCS corp status and suit history	0.6
2/15/2007	R&R msg from Betsy Franklin (BF)(in-house counsel DCS) says she knows my name and who I am- (Threatening Tone)	0.1
	R&R fax Betsy Franklin in re review case/denies allegations- asserts that notes and collector will substantiate the facts-	0.2
2/21/2007	E-corr BF in re fax merits/wage garnishment issue/ext ans	0.4
	Phones BF in re merits/possible ext Ans	0.6
	R&R fax Winston requesting Extension Answer to retain cleint DCS	0.1
2/26/2007	Phones and e-corr to BF in re Personal Credit Report by DCS, multiple reportings AJG default on perosol loans. Advised that Winston is handling case.	0.2
	Phones Winston- agree to extend Answer/ requests immediate correction to AJG credit report by DCS (reports show DCS placed 4 adverse reprotings on Goldstein credit file on 2/10 and 2/25- appears to be flagrant and personal attack on Counsel. Winston says it must be a mistake and i "must have my dates wrong". Warn of civil and criminal sanctions.	1.2
	E-corr to Jay Winston in re personal credit damage by DCS unlawful civil and criminal conduct by DCS to attack on Plaintiff Attorney credit report.	0.6
3/21/2007	R&R Notice of Appearance Jay Winston via ECF	0.1
3/22/2007	Phones JW	0.1
4/6/2007	R&R letter Jay Winston detailed denials, Rule 7.1 Corp Disc and Proposed Answer with Counterclaims: Defendant denies all facts, threatens counterclaims for bad faith litigation. Offer to settle: reimburse court costs for mutual dismissal valid until April 9 Only(1 business day to respond)	2.8
	R&R ECF bounce in re D Disc	0.1
	Phones client updates	0.6
	Phones Jay Winston (JW)	0.2
4/8/2007	Phones JWinston in re unreasonable assertions/requests reasonable settlement offer and withdraw counterclaims- Non-responsive.	0.6
4/13/2007	Review Answer	1.0
	Phones JW	0.7
	Phones client	0.4
5/10/2007	Phones JW msg in re Rule 26 requesting phone conf	0.1
	E-corr JW in re meet/confer Rule 26 request phone conf	0.1
5/11/2007	R&R e-corr JW in re Rule 26 conf -unavailable	0.1
5/14/2007	E-corr JW requesting phone conf 26	0.1
5/15/2007	Phones JW in re Rule 26 meet/confer schedule discussion/request withdrawl counterclaims inappropriate	0.7
5/16/2007	Prepare Initial Disclosures/organize docs	0.6
5/18/2007	Research issues/caselaw in re Leave to Dismiss Counterclaim	2.5
5/18/2007	Draft Letter Court requesting leave to dismiss counterclaim	0.8
5/25/2007	R&R Def Response & Exhibits (D request for 12b6 motion)	2.2
	Phone call to Def JW requesting settlement possibilites and avoid motions practice	0.6

DATE	NOTE / RECORD	TIME
	Phones client	0.2
5/29/2007	Phones client	0.1
6/4/2007	Phones client	0.4
6/8/2007	Letter Court reply in re dismiss counterclaim/oppose D motion 12b6	0.6
6/12/2007	R&R D initial 26a Disclosures	1.5
6/13/2007	Review Defendant's Letter Response to Plaintiffs Reply to dismiss counterclaim and oppose Defendants motion to dismiss purs 12b6 /exhibits	1.2
	Phones client	0.1
	Phone call to Def	0.3
6/20/2007	R&R ECF in re Hearing	0.1
	Phones JW in re consent to telephonic app no resp	0.1
6/28/2007	Draft Letter Ct Request telephone conference	0.3
6/28/2007	Review Defendant's response	0.4
	Phone call to Def- JW non cooperational	0.4
6/29/2007	Review Court Order re briefing schedule	0.1
7/5/2007	Prepare Initial Scheduling Order Questionnaire	0.6
	Phones JW in re Requesting disclosures	0.3
7/6/2007	Served Plaintiff's Initial Disclosures	1.0
	Research and prepare outline for Plaintiff's Motion to Strike Counterclaim	3.0
7/9/2007	Review Defendant's letter re briefing schedule	0.3
	Phones Def in re modify and revise schedule	0.3
7/20/2007	R&R ECF schedule order	0.1
8/14/2007	Final Prepare Draft and Serve Plaintiff's Notice of Motion to Dismiss Def Counterclaim/Serve upon Def	5.5
8/15/2007	R&R Defendant's Motion to Dismiss	4.5
	Phone call to JW	0.3
	E-corr JW	0.1
	Updates to client	0.4
8/16/2007	R&R Ecf bounce in re Def improper filing of motion	0.1
9/7/2007	Research Outline and Prepare and Draft Plaintiff's Memo in Opp to Def Motion to Dismiss	9.5
9/20/2007	R&R Defendant's Letter Motion to Continue	0.3
	Phones JW	0.4
	Updates to client	0.3
9/24/2007	Prepare and Draft Plaintiff's response to Defendant's Letter Requesting Continuation of Motion	0.3
9/24/2007	Review Court Order re Motion to Continue	0.1
10/3/2007	E-corr client	0.2
10/10/2007	Research Draft and Revise Plaintiff's Opposition to Defendant's Motion to Dismiss/Reply to Motion to Strike Counterclaim	8.0
	Draft CovLet Court	0.1
10/17/2007	Review Defendant's Reply; Declaration& Supp. Decl. of L. Hom; Exhibits/ Resesearch Cites and Analyze Exhibits	3.5
10/17/2007	Plaintiff's Reply to Def Opp re Plaintiff's Motion to Dismiss Counterclaim	3.5
10/17/2007	R&R multiple ECF bounces by JW filings	0.2
10/18/2007	Phones client	0.5
11/8/2007	Phones client requesting update	0.3
12/20/2007	Phone client requesting possible settlement before holidays	0.3
	Phones JW requesting settlement disc (no resp)	0.1
1/29/2008	R&R D Letter (improperly captioned Moore v DCS) wrong case/call MK rectify	0.3
3/22/2008	E-corr client request call	0.1

DATE	NOTE / RECORD	TIME
	Phones client in re status	0.4
5/7/2008	E-corr client in re status update	0.2
6/23/2008	Phones cleint in re status	0.4
7/21/2008	Phones client status concerned about progress/settlement options	0.7
	Phones JW in re status/settlement/intet to proceed with discovery while motions pending before J. Vitaliano	0.6
7/22/2008	Prepare and Draft Plaintiff's Combined Discovery Demands to Defendant	3.0
7/23/2008	Phones JW in re Disc (rejecting discovery)	0.6
8/4/2008	Phones JW in re Discovery Outstanding	0.4
8/5/2008	Review Defendant's Letter Motion to Stay Discovery	0.7
8/5/2008	Research Support and Prepare Plaintiff's Opposition to Defendant's Motion to Stay Discovery	1.5
8/5/2008	Review Defendant's Letter Brief	0.8
8/6/2008	Review Court Order re Motion to Stay (deferred ruling) & status conference	0.1
	Phones cleint in re status	0.4
8/11/2008	Review Defendant's Motion to Adjourn Conference	0.2
	Phones JW in re conference adjourn/sched	0.4
8/12/2008	Review Court Order re Motion to Adjourn Conference	0.1
	Phones JW	0.1
	E-corr JW in re Conf	0.1
	Phones client status	0.1
9/3/2008	Phones JW in re settlement attempts- requests specific damages and fees	0.7
9/7/2008	Phones client in re Conf/Damages Assessment	0.8
	Phones JW	0.1
	R&R e-corr client	0.1
9/10/2008	CT Conference in re Motion to Stay Disc (Ds motion denied)	2.0
	Mt w cleint at CT	0.5
	Conversation with JW outside Court. (JW attempted to have direct contact with client and intimidate her. Gave warning of sanctions.	0.6
	R&R Ct order in re sched	0.2
9/13/2008	Phones to JW re attempt at settlement negotiations- request breakdown of damages and legal fees in writing	0.2
9/16/2008	Phones JW in re settlement attempts - no resp	0.1
	Phones client	0.4
9/17/2008	E-corr JW breakdown damages/costs in re good faith attempt to settle	0.5
9/17/2008	R&R e-corr response from JW- conveyed offer to client	0.1
10/1/2008	Conversation M Kuntz (MK) D new attorney on case requests additional time for discovery resp. Not authorized to discuss settlement, needs to check with JW.	0.5
10/6/2008	R&R D repsonses to P Request for Admissions	1.0
	Phones JW/MK	0.1
10/10/2008	R&R D responses to Prod Docs/Interogg/Docs	2.5
	Phones MK in re non-responsive disc	0.3
10/13/2008	R&R e-corr MK	0.1
	R&R D Depo Notice	0.2
	Phones JW/MK in re non-responsive Discovery	0.1
	Phones client in re depo and sched	0.4
10/21/2008	R&R e-corr Arthur Winston (AW) request phone conf	0.1
	Phones AW in re outstanding Discovery/taking over for JW/says he will talk to Jay	0.8
	Phones client update discuss stl	0.4

DATE	NOTE / RECORD	TIME
11/20/2008	Phones JW/AW/MK in re outstanding disc- no response AW requested discovery disputes in writing	0.2
11/25/2008	Review D Disc/Prepare and Draft letter in re Outstanding Discovery items/fwd e-corr JW	3.5
	R&R e-corr JW (threats)	0.1
	E-corr JW in response to threats	0.1
	Phones JW no resp	0.1
12/3/2008	R&R e-corr AW -disc responses by Friday- further threats	0.2
	Phones AW in re JW threats	0.5
12/5/2008	Phones AW in re repsonses to Discovery not received	0.2
12/9/2008	R&R e-corr MK in re responses to disc	0.1
	R&R Letter AW in re responses to disc	0.2
	Phones AW attmpt to confer in re disc- items remianing	0.1
12/10/2008	R&R ECF in re telephone conf	0.1
	Draft Letter to J. Pohorelsky in re sched error and apologizing	0.2
	Phones D in re conf and reset/discuss outstanding disc	0.6
	Review J. Pohorelsky Indiv Rules in re Disc Motions	0.5
	Review and Revise Discovery Letter req Pre-motion conference and file with J. Pohorelsky	1.3
12/12/2008	R&R ECF Ct Schedule and Disc Order	0.2
12/17/2012	File Docs as per Ct Order	0.5
	R&R e-corr cleint	0.1
	R&R D response to request for outstanding discovery	1.5
12/23/2008	R&R Court Order in re Doc Production	0.6
	Phones AW/MK	0.1
	Phones client status	0.3
12/24/2008	Phones AW	0.1
	E-corr JW/AW/MK requesting consent to extend	0.1
12/26/2008	R&R Def First set fo Doc Request and Interoggs	2.5
	Phones cleint in re status disc/depo	0.4
12/29/2008	R&R response from JW in re will not consent to extend	0.2
1/5/2009	R&R Court Order in re Disclosures/P Depo	0.2
1/6/2009	E-corr JW/AW/MK request tel app and conf in re depo sched-reply JW	0.2
1/7/2009	Phone conf R.Leino of counsel in re depo review file/ phones Client in re Depo prep and review discovery log	6.5
	Phones MK in re depo	0.3
	E-corr MK in re depo sched	0.2
1/8/2009	Discussions with RL and Client in re Deposition of Plaintiff (R.Leino 11am-4pm 387 app fee)	3.0
	Production Disclosures/Docs File ECF a/p Ct Order	1.3
1/12/2009	R&R D Doc Prod Lola Decl 80pg (from Saturday)	1.5
	R&R e-corr MK in re faxing doc production (from Saturday)	0.1
1/13/2009	Phones JW/MK fax not received	0.2
	Draft e-corr JW/MK/AW request resend docs by PDF or mail/Request D depo dates	0.2
	R&R e-corr JW	0.1
1/14/2009	R&R e-corr MK in re docs	0.1
	R&R D doc production/fdcpa manual/training materials/records	3.0
	R&R ECF bounce in re D doc prod	0.1
1/19/2009	R&R e-corr MK in re JW letter	0.1
	R&R letter JW in re disc	0.1

DATE	NOTE / RECORD	TIME
	Phones MK in re D depo sched	0.3
1/20/2009	Prepare and Serve Deposition Notice	0.5
	Phones MK in re depo sched	0.1
1/26/2009	Phones D in re depo	0.1
1/27/2009	Phones D in re depo	0.1
1/29/2009	Phones D in re depo	0.2
	Draft Letter Motion to Compel D depo	0.6
1/30/2009	R&R Ct Sched Order	0.1
1/31/2009	R&R e-corr JW in re Plaintiff's discovery responses/no resp as to D depo	0.1
	Phones JW/MK	0.2
2/6/2009	R&R D JW response to motion to compel depo and request for docs	0.5
2/9/2009	R&R Court Order in re Hearing Sched/Revised	0.2
	Draft e-corr to Jwinston in re unscrupolous conduct and misreps to Court- notice for sanctions R11	
	R&R e-corr JW demands case be dismissed	0.1
2/10/2009	e-corr JW/AW/MK requesting consent to resched conf due to conflict	0.1
	R&R response JW - no consent	0.1
	Prepare Revised Responses to Defendants Discovery Request for Docs and Interoggs	3.3
2/13/2009	In- Court Hearing in re Discovery J. Pohorelsky	2.4
	Discussion with D counsel at CT	0.6
	E-corr JW/AW in re conference follow up request to consent to mag j	0.2
	Phones client update status	0.6
2/18/2009	R&R Court Order in re Discovery	0.2
2/19/2009	R&R e-corr JW in re decline consent to mag/ "cleint wants case dismissed"	0.2
	Prepare and Draft revised Rule 30b notice	1.0
	Phones cleint in re stl- D will not stl	0.4
2/25/2009	Phones JW in re D depo sched	0.1
	E-corr JW in re D depo sched/reply	0.3
2/26/2009	E-corr JW in re depo sched/reply/JW threatens motion	0.3
3/3/2009	E-corr MK/JW requesting conf to sched D depo	0.1
3/4/2009	R&R D Letter in re Outstanding Disc	0.6
3/6/2009	R&R D motion for Protective Order Limit/Waive Depo and various Exhbt	3.0
	Phones JW	0.1
3/9/2009	Research/Prepare and Draft Opp to D motion to waive depo	2.5
3/16/2009	R&R Court Orders in re Discovery/Protective Order	0.6
	Review docs for D depo	2.0
3/17/2009	Deposition of Defendant Corp Rep Dennis Christie	7.0
3/18/2009	Review notes and prepare list of doc requests pursuant to D depo	1.0
	Phones AW in re doc requests re Christie depo	0.4
3/30/2009	R&R e-corr MK in re Disc	0.1
	R&R Letter JW in re Disc	0.2
4/2/2009	R&R Supp Doc Production from De/ MK	0.2
	Phones MK/AW	0.4
	Telephonic CT conf	0.4
4/2/2009	R&R ECF bounce	0.1
4/6/2009	Draft Letter in response to D letter in re outstandind disc	0.8
	Prepare/fwd supplemental itemized doc production/disc responses to D	4.5
4/13/2009	R&R e-corr MK	0.1
	R&R Letter AW in re responses to disc	0.2
	Review Docs in re Letter AW and examine discrepancies	0.9

DATE	NOTE / RECORD	TIME
4/17/2009	R&R e-corr MK/reply in re disc and D threats for motion requesting additional disc	0.2
	Phones MK in re disc/explain that all items have been satisfied	0.3
	R&R e-corr in re requesting additional time to file motion	0.1
	R&R D motion for extension of time to file disc motion and review P disc	0.2
4/20/2009	R&R ECF Order	0.1
4/21/2009	R&R Depo Transcripts D	2.0
4/29/2012	E-corr MK in re status	0.1
	R&R e-corr and reply	0.2
5/4/2009	R&R ECF entry in re D requesting premotion conf Rule 56 mot	0.1
	R&R Letter D in re Premotion 56 conf	0.3
	Phones MK/AW in re JW requesting a Rule 56 mot while 12b6 motion is pending	0.3
5/18/2009	E-corr/Phones client update	0.6
	Phones MK/AW attempt to reason with JW	0.3
5/20/2009	Tel Conf CT	0.4
	Phones client	0.3
	Phones AW in re possibilites of settlement	0.3
	R&R e-corr MK	0.1
6/2/2009	Phones AW in re stl/follow up with	0.3
6/18/2009	Draft e_corr to AW in re unscrupulous litigation tactics/misrepresentations and failing to provide docs re Christie depo	
6/19/2009	R&R MK taking blame for Winston failures/says he will produce items by Monday/reply	0.3
6/22/2009	R&R e-corr MK in re supplemental doc production	0.1
	R&R docs	2.0
	Phones/E-corr MK in re incomplete production/Christie perj statements	0.3
	R&R e-corr MK will check with client	0.1
	E-corr/Phones client update	0.3
6/23/2009	R&R e-corr MK in re supplements doc prod	0.4
6/24/2009	Phones client in re settlement/trial necessary D will not agree to settlement	0.4
	R&R Order/Conf Transcripts per JV Order	0.7
6/29/2009	R&R Order in re Motion Dismiss	0.7
6/30/2009	Phones client in re status motion	0.6
	Consult/research in re motion for reconsideration/amendment issues	5.3
7/3/2009	Prepare and Draft Letter Motion request Leave to Amend	1.8
7/7/2009	R&R E-corr MK in re D offer to Settle	0.1
	R&R Letter AW in re D Offer to Settle (3K take it or leave it basis)	0.1
	E-corr/Phones client	0.4
7/10/2009	E-corr client in re stl/Court conf	0.2
	R&R D Opp to Leave to Amend	2.0
7/14/2009	CT Conference J. Vitaliano/Status Conf J. Pohorelsky	2.5
	Discussions Counsel	0.5
	Meeting w/ client	1.0
7/27/2009	Phones JW	0.3
	R&R Letter JW in re Motion	0.3
	R&R Ct order in re sched	0.2
	R&R D.Christie errata depo notes/transcripts	1.8
	Research in re overshadow/offers to settle 1692 analysis/case flow chart	4.0
8/4/2009	Prepare/Draft/Serve Motion to Amend	3.0
8/7/2009	R&R D Opp leave to Amend	1.3

DATE	NOTE / RECORD	TIME
9/15/2009	E-corr client	0.1
9/24/2009	E-corr/Phones client in re status	0.5
1/4/2010	R&R Ct Order	0.5
	Phones client	0.4
2/1/2010	R&R ECF Ct Order in re status conf	0.1
	Phones cleint	0.3
	Phones MK/JW/AW	0.1
2/16/2010	Phones MK/AW	0.3
2/17/2010	Tel. Conf J. Pohoreslky	0.4
	Phones MK/AW in re stl/msj	0.4
	Phones client	0.3
3/8/2010	R&R D Motion for Premotion Conf	0.2
	Phones JW/MK	0.1
3/10/2010	R&R Ct Order in re msj sched	0.1
3/13/2010	Phones MK/JW in re msj sched- attmpt stl	0.4
	R&R JW proposes sched	0.1
3/15/2010	R&R ECF order in re sched msj	0.1
3/24/2010	E-corr MK/JW/AW in re sched	0.2
3/25/2010	Phones JW/MK requesting time consent extend sched	0.3
	E-corr MK in re sched ext	0.2
	Draft letter request ext time	0.2
	R&R CT Order in re time ext sched	0.1
5/8/2010	R&R D MSJ/Ex	3.5
5/12/2010	E-corr/Phones cleint update status	0.6
6/4/2010	Research/Prepare and Draft Opp TO MSJ/Affidavits/Exhibits	18.0
7/1/2010	R&R Reply to MSJ	1.0
7/1/2010	Periodic updates to and status requests from client through 1/19/2012 including argument with cleint requesting that she will fire me and obtain new counsel since it has been so long and we have no resolution	7.0
1/19/2012	R&R Ct Order in re msj	1.0
1/23/2012	E-corr MK/JW/AW/AP in re pretrial conf	0.3
	Phones AP (new attorney)	0.8
	R&R ECF in re tel conf	0.1
2/2/2012	R&R E-corr from Sheila Chun from Winston and Winston in re Moore v Alliance One? Error/reply correction/Advise new counsel Hinshaw Culbertson	0.3
	R&R E-corr AP/reply	0.2
	Review caselaw and evidence in file for Rule 11 motion and 1927 sanctions against Winston	3.5
2/3/2012	R&R Notice of Appearance Connie Montoya via ECF/Consent to change	0.2
	Phones CM	0.1
2/7/2012	E-corr CM	0.1
	Phones CM in re status and conf/stl	0.6
2/10/2012	Phones CM in re conf appear in CT	0.4
	Phone CT error with calling system	0.5
	Phone Conf J. Pohoreslky	0.4
	Phones CM	0.3
2/21/2012	Telephone Conf CT	0.6
	R&R OOJ	0.3
	Phones client	0.5
3/9/2012	R&R E-corr and reply CM regardingt fees and costs negotiation	0.2

DATE	NOTE / RECORD	TIME
3/12/2012	E-corr corr CM regarding fees negotiation. Provided all records/billings/receipts and itemization of costs and demand/authorized to settle entire matter for 71K	0.4
3/15/2012	R&R e-corr CM offers 20K in fees and costs.	0.1
3/19/2012	E-corr exchange with CM in re fees and costs settlement/agree to reduce demand to 58K in fees if we can avoid motion practice and have prompt pymt	0.1
3/20/2012	D offers 25k final. Requests motion papers.	0.1
3/28/2012	Prepare motion for Attorneys Fees/exhibits and docs	4.5
	TOTAL:	256.4